EXHIBIT G

Toro Deposition

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF PUERTO RICO

****
UNITED STATES OF AMERICA :
:
Plaintiff :
:
v. :CIVIL NO. 98-1664(CCC)
:CIVIL NO. 98-2344(CCC)
33,92536 ACRES OF LAND, MORE :
OR LESS, SITUATED IN VEGA BAJA,:
COMMONWEALTH OF PUERTO RICO, :
AND JUAN PIZA BLONDET, AND :
UNKNOWN OWNERS :
:
Defendants :
:
****

DEPOSITION OF:

JULIO TORO McCOWEN

was taken on April 7, 2006 at the offices of the UNITED STATES ATTORNEY FOR THE DISTRICT OF PUERTO RICO, Torre Chardon, Chardon Avenue, Hato Rey, Puerto Rico, commencing at 9:38 a.m.

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these years have been interrupted either by graduate studies or work in other agencies and in the United States.

Q When did you begin working where you are working now before 1992?

A Before '92, well from '88 to '92 I worked as the Director of Operations of the Solid Waste Authority.

Q What does your division do, basically?

A We review and evaluate applications to extract materials from the earth's crust, including bodies of water like rivers and lakes and the sea.

Q From '92 to '98, you were basically working in the same thing that you're working in now?

A Approximately from '93 to March of '97.

Q From '92 to '93, what was your job?

A I was the assistant to the -- No, I'm sorry, wait. Ninety two?

Q Yes.

A From '92 to '93 I was in the division of Technical Assessment.

Q What did you do there?

A We would advice other divisions of the department and the general public, the Secretary directly, in the subject of natural resources' issues

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like flora, fauna and ecology.

Q It was basically the environment?

A It is the Department of Environmental and Natural Resources, yes.

Q Okay. What is a formal permit for sand extraction?

A A formal permit for sand extraction is an authorization that is awarded by the state to extract sand in a private land or in land that is of public domain.

Q And that includes any crust of the earth, including sand?

A Exactly and different kinds of sand.

Q Okay. And you would include there silica sand?

A Definitely, yes.

Q Let's go back to 98. I think you said you left in '97?

A Yes.

Q How much time, average, would it take to approve a permit back in '97, '98 or before?

A It's very difficult to answer that because it varies enormously.

Q If all the documents are correct, let's say I

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go to your office in '97 and everything is there, how long would it take?

A It varies from case to case.

Q What is the minimum would you say that it would take? Days, months?

A A pretty long time, months. It could take up to years.

Q So it can take basically months? When you say months, you mean like two to three months?

A More than that.

Q Five, six?

A I can't be specific about an exact number.

Q Would it be possible to get a permit and when I say, I'm talking only that moment, when I say to get a permit, I'm referring to that moment, '97, was it possible at that time to get a permit in three months?

A A formal permit?

Q A formal permit meaning if all the documents were correct and there.

A Extremely difficult.

Q Possible?

A When the Secretary issues an order of a specific case that awards that kind of decision.

Q So the answer is basically yes?

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MR. TAPICK: Object to the form.

THE DEPONENT: It is not normal for it to come out in two or three months unless the Secretary gives a specific order.

EXAMINATION CONTINUED

BY MR. PIZA:

Q So basically it varies from case to case?

A That is so.

Q But it is a possibility?

A Of course it is.

Q What documents did you bring with you today?

A I brought the new regulations, the regulation that was in effect at that time, some documents and letters from prior public servants related to cases about Mr. Piza Blondet in the Guarico Sector of the Yeguarda Barrio Vega Baja, the last denial that was issued from the Arecibo Regional Office that was issued February 20, 2006 to Mr. Juan Piza Blondet, a letter from the Munphrey Law Firm, the documents of the U.S. District Court, internal memos from the division of 1989 related to Mr. Piza's cases, internal memo from 1989, letters from interim regional directors of 1989, letter from the Fish and Wildlife Service related to species that are in danger of extinction, in a place where Mr.